

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Cindy Lou Rich-Sheets  
( SSN: XXX-XX-1481 )

Debtor.

Hearing Date: May 23, 2013  
Hearing Time: 12:30 PM  
Hearing Location: Albany

Case No. 13-10283  
Chapter 13

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TRUSTEE'S OBJECTION TO CONFIRMATION

Andrea E. Celli, Chapter 13 Standing Trustee for the Northern District of New York

(the "Trustee") states the following as and for her objection to confirmation of the Chapter 13

Plan. The Debtor filed the petition for relief on Feb 07, 2013. The Proposed Plan is as follows:

| Start      | Periods | Amount   | Type    |
|------------|---------|----------|---------|
| 03/01/2013 | 60.00   | \$500.00 | MONTHLY |

The Trustee objects to the confirmation of the proposed plan and submits that the plan does not meet the requirements for confirmation under 11 U.S.C. 1322, 1325 as follows:

**INFORMATION NEEDED:** The Trustee cannot determine if all provisions of 11 U.S.C.

§ 1325 have been met and requests additional information to assist in her determination, as follows:

-Evidence of perfection of HSBC mortgage

Amended Schedule C

**WHEREFORE**, the Trustee respectfully requests that this Court issue an Order denying confirmation of the plan or briefly adjourning the hearing on confirmation to allow the movant to resolve the objection contained herein.

Respectfully Submitted,

ANDREA E. CELLI, CHAPTER 13 TRUSTEE

By: /s/ Andrea E. Celli  
Andrea E. Celli, Chapter 13 Trustee  
7 Southwoods Blvd.  
Albany, NY 12211  
(518) 449-2045

UNITED STATES BANKRUPTCY COURT  
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IN RE: Cindy Lou Rich-Sheets

**AFFIDAVIT OF SERVICE**

Case No.: 13-10283

Debtor

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SHARON MCGUIRE, BEING DULY SWORN, DEPOSES AND SAYS: THAT SHE IS OVER THE AGE OF 18 YEARS; THAT SHE SERVED A COPY OF **TRUSTEE'S OBJECTION TO CONFIRMATION** DATED MAY 13, 2013 ON THE FOLLOWING MANNERS: ON MAY 13, 2013.

**VIA ELECTRONIC FILING:**

Office of the United States Trustee  
74 Chapel Street  
Albany, NY 12207

MICHAEL J TOOMEY, ESQ  
TOOMEY & GALLAGHER  
ONE SOUTH WESTERN PLAZA  
GLENS FALLS, NY 12801

**VIA REGULAR U.S. MAIL**

Cindy Lou Rich-Sheets  
PO Box 200  
Hartford, NY 12838

BY DEPOSTING A TRUE AND CORRECT COPY OF THE SAME PROPERLY ENCLOSED IN A POST-PAID WRAPPER IN THE OFFICIAL DEPOSITORY MAINTAINED AT 7 SOUTHWOODS PLAZA, ALBANY, NEW YORK DIRECTED TO SAID PERSON(S), AT SAID ADDRESSES.

/s/ SHARON MCGUIRE

SHARON MCGUIRE

Sworn before me this  
13th day of May, 2013

/s/ Debra A. Wasielewski

Reg. # 01WA6041536

Notary Public - State of NY

Qualified in Rensselaer County

My Comission Expires 05/08/2014